

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

UNITED STATES OF AMERICA)	Criminal No: 2:21-CR-600-MBS
)	
vs.)	
)	
KARL H. ZERBST, JR.)	

**DEFENDANT'S SUPPLEMENT
TO MOTION FOR DOWNWARD DEPARTURE AND/OR VARIANCE**

Defendant Karl Zerbst respectfully supplements his Motion for Downward Departure and/or Motion for Variance from the Sentencing Guidelines. ECF # 30. Defendant respectfully submits two recently received additional documents for the Court's consideration. **Exhibit 1** is an additional character reference in support of Defendant by Hermenia Walker whose mother, Mamie Chavis, benefitted from Karl Zerbst's efforts on her behalf. **Exhibit 2** is a recent news article listing 12 defendants prosecuted by the U.S. Attorney's Office (D.S.C.) for a financial fraud conspiracy who, last month, were all sentenced to five years of probation, most with home confinement, and whose restitution amounts averaged \$283,170 and ranged from \$74,868 to \$976,076.

Respectfully submitted,

s/ Joseph P. Griffith, Jr.

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